

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 6:24-CR-17
	§	JUDGE JDK/JDL
FRANSISCO GONZALEZ	§	
a/k/a KIKO GONZALEZ	§	

ELEMENTS OF THE OFFENSE

The United States of America, by and through the United States Attorney for the Eastern District of Texas, files this pleading summarizing the elements of the offenses to which the defendant intends to enter a plea of guilty to Counts 2 and 4 of the Indictment:

Title 18, United States Code, Title 18, United States Code, Section 2251(a), makes it a crime to employ, use, persuade, induce, entice, or coerce any minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct.

To establish that the defendant is guilty of Sexual Exploitation of Children, the government must prove the following beyond a reasonable doubt:

First: That the defendant employed, used, persuaded, induced, enticed, or coerced a minor to engage in sexually explicit conduct;

Second: That the defendant acted with the purpose of producing a visual depiction of such conduct; and

Third: That the visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

Respectfully submitted,

DAMIEN M. DIGGS
UNITED STATES ATTORNEY

/s/ Nathaniel C. Kummerfeld
NATHANIEL C. KUMMERFELD
Assistant United States Attorney
Texas Bar No. 24060122
110 N. College, Ste. 700
Tyler, TX 75702
(903) 590-1400
(903) 590-1439 (fax)
Nathaniel.Kummerfeld@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant via the court's CM/ECF system on this the 7th day of January, 2025.

/s/ Nathaniel C. Kummerfeld
Nathaniel C. Kummerfeld